

EXHIBIT “E”



DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Public Health Service
Food and Drug Administration
200 C Street, S.W.
Washington, D.C. 20204

AUG 22 1979

Mr. Kenneth B. Basa
National Food Ingredient Company
4830 S. Christiana Avenue
Chicago, Ill. 60632

Dear Mr. Basa:

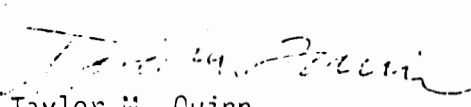
This is in reply to your letter of July 31, 1979 concerning the use of vanilla-vanillin and natural non-vanilla derived flavorings in category II Vanilla Flavored Ice Cream.

We will respond to your questions in the order in which they appear in your letter.

1. Natural flavors not derived from vanilla beans may be used in combination with the standardized items included under 21 CFR 169 (vanilla-vanillin extract or vanilla-vanillin flavoring) for category II vanilla flavored ice cream provided that the flavoring contributed by or derived from the vanilla beans predominates.
2. The combination of vanilla-vanillin extract or vanilla-vanillin flavoring with natural flavors not derived from vanilla beans as provided above may be marketed in a single package. However, such a combination should in no way imply or suggest that this combination is one of the standardized flavors covered under 21 CFR 169.
3. The labeling for the above combination flavoring should identify what the combination is, e.g. "Vanilla-Vanillin Extract and _____" (the blank to be filled with the names of the particular flavors used) or "Vanilla-Vanillin Extract with other natural flavors". The ingredient statement should declare the standardized flavoring by its specific common or usual name with a parenthetical listing of the optional ingredients required to be declared by the particular standard, and each ingredient of the natural non-vanilla flavoring should be declared by its specific common or usual names.

If we can be of further assistance, please let us know.

Sincerely yours,


Taylor M. Quinn
Associate Director
for Compliance
Bureau of Foods